

CAHILL GORDON & REINDEL LLP
32 OLD SLIP
NEW YORK, NY 10005

DANIEL R. ANDERSON
HELENE R. BANKS
ANIRUDH BANSAL
DAVID L. BARASH
LANDIS C. BEST
BRADLEY J. BONDI
BROCKTON B. BOSSON
JONATHAN BROWNSON *
DONNA M. BRYAN
JOYDEEP CHOUDHURI *
JAMES J. CLARK
CHRISTOPHER W. CLEMENT
LISA COLLIER
AYANO K. CREED
PRUE CRIDDLE ±
SEAN M. DAVIS
STUART G. DOWNING
ADAM M. DWORKIN
ANASTASIA EFTIMOVA
JENNIFER B. EZRING
HELENA S. FRANCESCHI
JOAN MURTAGH FRANKEL

JONATHAN J. FRANKEL
ARIEL GOLDMAN
PATRICK GORDON
JASON M. HALL
STEPHEN HARPER
WILLIAM M. HARTNETT
NOLA B. HELLER
CRAIG M. HOROWITZ
TIMOTHY B. HOWELL
DAVID G. JANUSZEWSKI
ELAI KATZ
JAKE KEAVENY
BRIAN S. KELLEHER
RICHARD KELLY
CHÉRIE R. KISER ‡
JOEL KURTZBERG
TED B. LACEY
MARC R. LASHBROOK
ALIZA R. LEVINE
JOEL H. LEVITT
GEOFFREY E. LIEBMANN
BRIAN T. MARKLEY

TELEPHONE: (212) 701-3000
WWW.CAHILL.COM

1990 K STREET, N.W.
WASHINGTON, DC 20006-1181
(202) 862-8900

CAHILL GORDON & REINDEL (UK) LLP
20 FENCHURCH STREET
LONDON EC3M 3BY
+44 (0) 20 7920 9800

WRITER'S DIRECT NUMBER

MEGHAN N. McDERMOTT
WILLIAM J. MILLER
EDWARD N. MOSS
NOAH B. NEWITZ
WARREN NEWTON §
DAVID R. OWEN
JOHN PAPACHRISTOS
LUIS R. PENALVER
KIMBERLY PETILLO-DÉCOSSARD
SHEILA C. RAMESH
MICHAEL W. REDDY
OLEG REZZY
THORN ROSENTHAL
TAMMY L. ROY
JONATHAN A. SCHAFFZIN
ANDREW SCHWARTZ
DARREN SILVER
JOSIAH M. SLOTNICK
RICHARD A. STIEGLITZ JR.
ROSS E. STURMAN
SUSANNA M. SUH
ANTHONY K. TAMA

JOHN A. TRIPODORO
GLENN J. WALDRIP, JR.
HERBERT S. WASHER
MICHAEL B. WEISS
DAVID WISHENGRAD
C. ANTHONY WOLFE
COREY WRIGHT
ELIZABETH M. YAHL
JOSHUA M. ZELIG

* ADMITTED AS A SOLICITOR IN
ENGLAND AND WALES ONLY
± ADMITTED AS A SOLICITOR IN
WESTERN AUSTRALIA ONLY
‡ ADMITTED IN DC ONLY
§ ADMITTED AS AN ATTORNEY
IN THE REPUBLIC OF SOUTH AFRICA
ONLY

212-701-3352

June 17, 2022

Re: *Wildman v. Deutsche Bank Aktiengesellschaft, et al.*, No.
21 Civ. 4400 (E.D.N.Y.) (HG) (RML)

Dear Judge Gonzalez:

We represent Deutsche Bank Aktiengesellschaft ("DB AG") and Deutsche Bank Trust Company Americas ("DBTCA" and together with DB AG, "Deutsche Bank") in this action. We write, pursuant to Section IV.C of Your Honor's Individual Practices, to request oral argument on Deutsche Bank's pending Motion to Dismiss Plaintiffs' Corrected Amended Complaint.

The papers for the pending motions to dismiss, including Deutsche Bank's motion, have all been filed as of June 3, 2022. ECF No. 67. We understand that, per Your Honor's Individual Practices, Your Honor instructs that "[p]arties may request oral argument by noting 'Oral Argument Requested' in their Notice of Motion or opposing memorandum[.]" Because Deutsche Bank (and all other defendants) filed its moving brief and accompanying papers while Judge Matsumoto was presiding over the action, Deutsche Bank was conforming with Judge Matsumoto's Chambers Practices. *See* Chamber Practices of Judge Matsumoto at III.E ("A party seeking oral argument on a motion shall file a separate letter, titled 'Request for Oral Argument,' at the time the fully-briefed motion is filed on ECF."). Thus, Deutsche Bank did not include the notation requesting oral argument required per Your Honor's Individual Practices.

Given Deutsche Bank's intent to file a letter requesting oral argument consistent with Judge Matsumoto's Chamber Practices, we respectfully request that Your Honor excuse the departure from your Individual Practices and accept this letter as Deutsche Bank's request for oral argument on its pending Motion to Dismiss Plaintiffs' Corrected Amended Complaint.

Respectfully submitted,



David G. Januszewski

The Honorable Hector Gonzalez
United States District Court Judge
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

By ECF

cc: Counsel of Record